

EXHIBIT B

ORIGINAL

JOSEPH SCHWARTZ

Page 1

IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY, PENNSYLVANIA

KEVIN HAMPTON, as : CIVIL DIVISION
Executor for the : NO. 141203114
Estate of PEARL :
DEVINE, deceased :

vs. :

RC OPERATOR, LLC :
d/b/a WILLOW :
TERRACE; SKYLINE :
HEALTHCARE, LLC; :
ARIAL INVESTMENTS, :
LLC and ALEX :
RINGKAMP, NHA :

THURSDAY, JUNE 15, 2017

VIDEOTAPE DEPOSITION OF JOSEPH
SCHWARTZ, taken pursuant to notice, was held
at the law offices of Segal McCambridge, 15
Exchange Place, Suite 1020, Jersey City, NJ
07302, commencing at 10:14 a.m., before
Kimberly S. Gordon, a Registered
Professional Reporter, Certified Court
Reporter and Notary Public.

Ace Reporters, Inc.
The Bourse Building, Suite 1030
Philadelphia, Pennsylvania 19106

89 North Haddon Avenue, Suite D
Haddonfield, New Jersey 08033

JOSEPH SCHWARTZ

Page 90

1 we are very, very, some people -- because a
2 guy sends a bill in doesn't mean he needs to
3 get paid.

4 Q. So a nursing home when you,
5 conceptually, when you think about what it
6 is, it's a roof over the resident's head,
7 right, in part? Is that true? It's a home
8 for these residents?

9 A. Okay.

10 Q. It's also a place where certain
11 people are, in fact, some of society's most
12 vulnerable and dependent adults live.

13 A. Okay.

14 Q. People that are dependent on the
15 staff at the facility to meet sometimes all
16 of their needs.

17 A. Okay.

18 Q. So you would agree that it would be
19 important to pay bills related to keeping a
20 roof over their head, right?

21 A. I would --

22 MS. DAVIS: Objection to the
23 form.

24 THE WITNESS: I would say
25 straight to you our patients in our

JOSEPH SCHWARTZ

Page 104

1 **A. Again, again, --**

2 MS. DAVIS: Objection to form.

3 THE WITNESS: -- I'll explain
4 to you again the same thing, and I'll
5 explain to you again.

6 We -- our intentions is always
7 to do the right and best thing and
8 make sure that there is medication.
9 At no time was any medication not
10 delivered to our facility. This is a
11 disagreement between a contractor.
12 That's all.

13 BY MR. WILANDER:

14 **Q. Well, you ultimately have the say in**
15 **whether bills are going to be paid or not?**

16 MS. DAVIS: Objection.

17 MR. YAVIL: Objection.

18 THE WITNESS: Again, I've
19 explained to you. I'm constantly
20 telling you, if a bill is not paid,
21 could be there's a disagreement.
22 Because you bill doesn't mean that's
23 the number that you're entitled to.

24 BY MR. WILANDER:

25 **Q. Do you need to take a break? Do you**